

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF LUI HOKOANA

Pursuant to 28 U.S.C. § 1746, I, LUI HOKOANA, hereby declare as follows:

1. I am a resident of the Commonwealth/State of Hawai‘i. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.
2. I am currently employed by the University of Hawai‘i as Chancellor of University of Hawai‘i Maui College.
3. The University of Hawai‘i is responsible for public higher education in the State of Hawai‘i.
4. As Chancellor of the University of Hawai‘i Maui College, I serve as the Principal Investigator of the Minority Business Development Agency (MBDA) PĀ‘OIHANA Grant MB21OBD8020251.

5. In my experience, over the course of my 32 year career in higher education, i have implemented college training programs that successfully support advancement of socio-economically disadvantaged students.

6. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including the MBDA, to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

7. The MBDA is the primary federal agency tasked to assist Minority Business Enterprises (MBEs) in overcoming the history of social and economic disadvantage that has limited their participation in America’s economy.

8. Pursuant to an agreement with the MBDA, University of Hawai‘i Maui College operates the MBDA PĀ‘OIHANA Grant MB21OBD8020251 to provide college-based entrepreneurship training and business coaching, mentoring, and incubation services.

9. The services provided by the MBDA PĀ‘OIHANA Grant include offering new entrepreneurship curricula and training programs, supporting student generation of business plans and market ready products, and providing business start-up coaching and mentoring.

10. In providing those services, the MBDA PĀ‘OIHANA Grant Program is assisted by the MBDA’s provision of grant funding, technical assistance, and networking with all other MBDA programs and affiliated national business organizations.

11. In my opinion, the MBDA’s services outlined above are critical for the development of Minority Businesses Enterprises in Hawai‘i because of the State of Hawai‘i’s need for economic recovery and diversification.

12. The MBDA also provides grants through pilot projects and programs such as Entrepreneurship Education for Formerly Incarcerated Persons and Enterprising Women of Color Business Centers.

13. In October 2021, University of Hawai'i Maui College received the MBDA PĀ'OIHANA Grant MB21OBD8020251 in the amount of \$902,133.00 to provide curriculum development and new entrepreneurship training programs, as well as business start-up coaching and mentoring.

14. University of Hawai'i Maui College's budget for this year has relied on this funding, and we made plans and allocated funding, and offset other funding for curriculum development, training, and coaching and mentoring based on the anticipated receipt of the promised funding.

15. University of Hawai'i Maui College plans to institutionalize MBDA funded curriculum and courses through additional grants and philanthropy.

16. Any pause in funding would displace the students currently in training programs and disrupt the curriculum development and courses in progress.

17. Three grant program staff providing curriculum development, training, and coaching and mentoring services will lose their jobs if grant funding is withheld or delayed.

18. University of Hawai'i Maui College has consistently met reporting and compliance requirements for the MBDA PĀ'OIHANA Grant Program. The college possesses an excellent record of obtaining, administering and delivering positive outcomes for extramural grants. in spite of the Covid pandemic and Lāhaina wildfires disasters, the program has exceeded four out of five target metrics and is on track to exceed the remaining metric:

ACTIVITY TYPE	Cumulative Total as of 3/31/25	Grant Proposal Target	Percent of Target
Number of Entrepreneurship Courses Taught	32	16	200%
Number of Students Impacted	450	200	225%
Number of Product/Service Innovations Created	135	160	84%
Number of Business Plans Generated	194	180	108%
Number of Students Reporting Income Generation	121	60	202%

19. In the next eight months, we are scheduled to receive disbursements/reimbursements of \$549,005.47 obligated under our current awards.

20. The next expected reimbursement billing is April 28, 2025. If we do not receive such disbursements/reimbursements, it will negatively impact students by delaying the offering of training courses, coaching and mentoring services. This will diminish important economic recovery and diversification programming.

21. Termination of this grant or delays in reimbursement funding will result in the loss of three grant program staff and negatively impact students by eliminating training courses, coaching and mentoring support services, and curriculum development. That would diminish timely and important economic recovery and diversification programming.

22. If the MBDA ceased to function in a meaningful way, in my opinion, given that Maui's economy has been significantly impacted by the covid pandemic and Maui wildfires, MBDA has helped to stimulate the Maui economy by adding 27 start-up companies, 54 jobs, and infusing \$1 million in business revenue into our economy.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on March 25, 2025, at Kahului, Hawai'i.



DR. LUI HOKOANA, CHANCELLOR